

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN PRODUCTS  
LIABILITY LITIGATION,

MDL NO. 2875

THIS DOCUMENT RELATES TO:

HON. ROBERT B. KUGLER  
DISTRICT JUDGE

*Richard Ramirez v. Zheijiang Huahai  
Pharmaceutical, USA, Inc., et al*

**PLAINTIFFS' NOTICE OF VIDEOTAPED DEPOSITION OF  
DR. MARWAN ISKANDARANI**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), Plaintiff will take the cross deposition upon oral examination of Dr. Marwan Iskandarani, on **November 4, at 9:30 a.m. E.T**, and continuing until completion, via remote deposition while the witness is at his home or office or other location agreed to by the parties

Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorization to administer oaths who is not counsel of records or interest in the events of this case. The court reporter and videographer will be an employee or agent of Worldwide Court Reporters, and they have provided that the remote deposition will take place at the following link:

<https://us02web.zoom.us/j/85983151402?pwd=NUF3S2Z5TFg0N2pSTXNyTzlwRVIDZz09>

The deponent is further requested to bring to the deposition those items requested in Exhibit A attached hereto.

Additionally, in accordance with paragraph B (1) of C.M.O 20 (Dkt. 632), notice is hereby given that the undersigned will be the lead questioning attorney during the cross deposition. The attorney contact for the cross deposition is:

David McClendon  
Watts Guerra, LLC  
5726 West Hausman Rd. Ste. 119  
San Antonio, TX 78249  
Telephone: (210) 448-0500  
E-Mail: dmclendon@wattsguerra.com

Date: October 21, 2021

Respectfully submitted,

/s/ Paige N. Boldt  
Paige N. Boldt  
WATTS GUERRA LLC  
5726 West Hausman Rd. Ste. 119  
San Antonio, TX 78249  
Telephone: (210) 448-0500  
E-Mail: pboldt@wattsguerra.com

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 21<sup>st</sup> day of October 2021, I caused a true and correct copy of the foregoing Notice of Videotaped Deposition of Dr. Marwan Iskandarani to be served upon counsel of record. I further certify that a copy of the foregoing was served on Defendant's counsel by e-mail on October 21, 2021.

This 21<sup>st</sup> day of October 2021.

/s/ Paige N. Boldt  
*Attorney for Plaintiff*

**Exhibit A**

**Documents to be Produced**

You shall bring to the deposition the following documents that are in your possession, control or custody:

1. A current version of your CV/resume.
2. A list of all of your publications.
3. Any and all correspondence between you and any defendant in this MDL.